

## **BOARD TAKES ACTION ON ORAL EXAM**

On November 2, 2001, the California Board of Psychology (BOP) held a public regulation hearing in which the Board unanimously voted to adopt regulations which will eliminate the oral examination component for licensure. This historic action followed several years of intense investigation and study by the Board. (For details, visit the BOP website at [www.psychboard.ca.gov](http://www.psychboard.ca.gov)).

The BOP has the responsibility to establish requirements for licensure to independently practice psychology in California. The requirements have included a doctoral degree in psychology, 3000 hours of qualifying supervised professional experience, passing the Examination for the Professional Practice of Psychology (EPPP), and passing the oral examination. Effective 1/1/02, the oral examination will no longer be required. However, the regulations adopted on November 2<sup>nd</sup> include a new requirement. Candidates must pass a written examination that covers California laws, regulations and professional ethics (California Jurisprudence and Professional Ethics Examination---CJPEE).

There has been some confusion that the CJPEE is designed to replace the oral examination. While it is correct that the oral exam will be eliminated and the CJPEE will be required, it was never the intention of the BOP that the CJPEE would attempt to assess the content areas of the oral exam. They are different exams designed to assess different content areas.

## **WHY DID THE BOP ELIMINATE THE ORAL EXAM?**

For years we have questioned the value of the oral examination. While it is clear that the oral exam had value in terms of professional development, rites of passage, a tool for encouraging prospective licensees to develop verbal skills which demonstrate a certain "readiness" to be a member of the psychological community, etc., it must be remembered that these are not the mandates of a licensing board. The mandates of the BOP are to "protect the public from the unauthorized and unqualified practice of psychology and from unprofessional conduct by persons licensed as psychologists." As can be reviewed from the information on the BOP website, we made multiple inquiries which resulted in the board's conclusion that the oral exam could be eliminated without compromising the health and safety of the public. We consulted with experts in the area of occupational examination development. We conducted reliability studies of the exam and reviewed the examination requirements of every state in the United States. We reviewed the examination requirements of other health professions including medicine, nursing, dentistry, and others. We met for hours with many of our licensees, including experienced oral commissioners and we held open forums in both Northern and Southern California to allow the public to present opinions and to have input into the process. Finally, we followed the legal mandates of the public rulemaking process which culminated with the public

regulation hearing and formal adoption of the regulation proposals on November 2, 2001.

There has been quite a bit of misunderstanding about the methods by which we arrived at the decision to eliminate the oral exam. In fact, the majority of the criticism we received was not that the exam was eliminated (even our harshest critics acknowledged there are significant problems with the oral examination), but rather they questioned the methods we employed and the speed with which they perceived us to have moved. The BOP set out on a venture to gather information that would result in well reasoned regulations that are legal, fair and in the public interest. The BOP has made many changes in policy and regulation through the years. We create (and change over time) regulations regarding supervision, continuing education, examinations, and enforcement, among others. We make these decisions based on many variables.

The BOP has progressed in its quest to ensure that its licensing and examination programs are fair and meet legal standards set forth in the Business and Professions Code. The criticism leveled at the BOP resulted from misconceptions that we took actions based on the scientific standards of focus groups, validation studies, and other efforts. Although we considered the recommendations of focus groups and the pilot validation study, other factors were also considered (including direct personal observation and experience during many years of exam development and administration practices). The fact is, we approached the issues from several fronts in an effort to gather information and facts that would lead us to an informed decision commensurate with our responsibilities as a regulatory board.

Norman Hertz, Ph.D., the director of the Office of Examination Resources, is a nationally recognized expert in the development of licensing examinations. He has been instrumental in the ongoing development efforts of the oral exam since 1990. He has worked diligently towards making the exam comply with educational and psychological testing standards (as mandated by section 139 of the Business & Professions Code). He is committed, as is the board, to asking difficult and controversial questions about the BOP's examination program. His conclusion is that we do not have a valid oral examination. He has stated that he has taken this exam as far as an oral exam can be taken in efforts to achieve validity. He hoped and strived, as did we all, that there would be a better product by this time that we could without a doubt, call valid. The fact is, there is not. The board applauds Dr. Hertz' professional integrity and courage to render an objective opinion without regard for personal influence by the board, members of professional associations, or others. However, the decision to eliminate the oral exam rested solely with the BOP. Dr. Hertz did not make the decision for the board. The board's legal counsel did not make the decision for the board. The external testing expert from Rand Corporation, the focus groups, or validation studies did not make the decision for the board. We held public forums throughout the State to hear from all interested parties. We reviewed

examination programs of psychology licensing boards throughout North America, and found that fewer than one-third of these boards utilize a competency based oral examination. We reviewed disciplinary data from states without such an oral exam to see if there was a relationship between competency based oral exams and discipline and we found no correlation. No single one of these individual efforts led the BOP to the conclusion to eliminate the oral exam. All of this information was distilled and after many conversations (often heated ones) among Board members, the Board voted unanimously to eliminate the oral exam. Based on our comprehensive review of this issue, we are confident the public is not placed at an increased risk of harm by incompetent psychologists as a result of issuing a license without administering the oral exam.

Such breaks in tradition are often difficult to accept at first. The oral exam has been a mainstay of psychology licensure for a long time in California. However, it was an exam which even in its continuous attempts to be psychometrically sound, was too subjective and in our opinion did not comply with testing standards and consequently does not comply with California law.

So, we will miss the sense of duty and responsibility we shared with the many psychologists who so graciously gave of their time and energy to help write the exams. We will miss the dedicated oral examiners who came together to give something back to the profession and toil through long and tedious days of examinations. To many, the oral exam represents the final path by which candidates join us in a profession we cherish. In many ways, saying goodbye to this exam is like saying goodbye to an old friend.

This is the end of the chapter, but not the end of the story. The BOP continues to review the requirements for licensure and the practice of psychology. It is reasonable to consider the value of competency based examinations. Although we are of the opinion that there are many inherent problems in an oral examination, we will continue to consider options that reflect best practices in terms of public protection and the evolution of professional psychology. There are many questions to consider and there are many stakeholders. The APA currently has a committee reviewing the need for certifying specialists in the various areas of psychology. The American Board of Professional Psychology (ABPP) established a program of certifying psychologists in specialty areas. There are ongoing groups, such as the Association of Psychology Postdoctoral and Internship Centers (APPIC) which will hold a conference to attempt to define "minimal competency." In the meantime, we have proposed that the Association of State and Provincial Psychology Boards (ASPPB) (the association comprised of all psychology licensing boards in the United States and Canada, who develop and administer the EPPP) study the issue of a competency exam for licensure. At this point, California, as well as most states, do not license specialists. The psychology license is a generic license which allows licensees to practice in areas in which they have the proper education, training and experience. Many have questioned why we had what is essentially a clinical/counseling exam for

generic licensure. ASPPB is uniquely positioned to take into account the experience of all licensing boards in the United States and Canada. Perhaps if a majority of licensing boards conclude that a competency exam is essential as a complement to the EPPP, there could be an effort to develop this exam and administer it nationally. Hopefully, this would be an objective, standardized exam that eliminated all the pitfalls of an oral exam.

The BOP appreciates all of the time and effort by the people who contributed to this important change to regulations regarding licensure. The board's Executive Officer, Tom O'Connor and his staff, the OER, and the California Psychological Association and others who took the time to contribute to the process have all added significantly and honorably to the debate. We are satisfied that the changes are a move in the right direction and look forward to continuing along a path that keeps California in the forefront of the regulation of the practice of psychology.